

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

/

JOINT STATUS REPORT PROPOSING SCHEDULING ORDER

The United States of America, by and through its undersigned counsel, respectfully submits the following joint status report proposing a pretrial schedule.

The defendant, Carlos Ramon Polit was arraigned on May 27, 2022, on an indictment charging money laundering offenses [DE 1]. On June 3, 2022, the Court entered an Order setting pre-trial schedule and procedures and scheduling trial to commence on July 18, 2022 [DE 50]. The trial date has been reset multiple times: initially to May 22, 2023 [DE 57], then to October 23, 2023 [DE 89], to January 23, 2024 [DE 101] and, most recently, to April 8, 2024 [DE 112].

After conferring, the parties respectfully propose the following schedule to prepare for an April 8, 2024, trial and respectfully request that the Court enter a scheduling order as follows:

- December 22, 2023: Motion for Rule 15 depositions
- February 5, 2024: United States' expert disclosure
- February 12, 2024: Defendants' expert disclosure
- March 4, 2024: United States' and Defendant's exhibit and witness lists
- March 4, 2024: Motions in limine

- March 18, 2024: United States' and Defendant's updated exhibit and witness lists
- March 21, 2024: Proposed voir dire, jury instructions, and verdict form
- March 22, 2024: Responses to motions in limine
- March 25, 2024: pre-trial conference

The parties anticipate that the case can be tried in approximately 3 weeks.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system on December 20, 2023 and that a copy of the foregoing was thereby e-mailed to counsel of record.

By: /s/ Michael N. Berger
Assistant United States Attorney